

TMS
09-20-2022
1312

OFFICE OF CITY ATTORNEY
21 SEP 22 AM 8:55

NOTICE OF INJURY

TO: **Milwaukee Police Department**
6680 North Teutonia Avenue
Milwaukee, Wisconsin 53233

Chief of Police Jeffrey B. Norman
6680 North Teutonia Avenue
Milwaukee, Wisconsin 53233

Police Officer Kaonnie M. Whitley
Police Administration Building
749 West State Street
Milwaukee, Wisconsin 53233

Police Officer Nicholas M. Kropp
Police Administration Building
749 West State Street
Milwaukee, Wisconsin 53233

City of Milwaukee
200 E. Wells Street
Milwaukee, Wisconsin 53233

The following is a notice of injury made pursuant to section 893.80(1)(a), *Stats.* This document is not a claim for damages. No claim for damages is made at this time.

1. Claimants Kelvyon C. Hill and Morhonda S. Hill are residents of the State of Wisconsin and reside at 414 E. Chambers Street, Milwaukee, Wisconsin 53212.

2. Claimants Kelvin Williams and Tonja Williams are residents of the State of Wisconsin and reside at 5212 N. 84th Street, Milwaukee, Wisconsin 53225.

3. Kelvyon C. Hill and Morhonda S. Hill were injured due to the negligence of the above-named parties and are both lawful claimants in accordance with the laws of Wisconsin.

4. Kelvin Williams, along with his wife, Tonja Williams, were injured due to the negligence of the above-named parties and are both lawful claimants in accordance with the laws of Wisconsin.

5. The Milwaukee Police Department is organized as a subdivision within the City of Milwaukee, Wisconsin, and existing under the laws of the State of Wisconsin, with its principal offices located at 749 W. State Street, Milwaukee, Wisconsin 53233.

CITY OF MILWAUKEE
2022 SEP 20 PM 4:52
CITY CLERK'S OFFICE

6. The City of Milwaukee is a body politic, duly organized as a municipal corporation under Wisconsin law, and is located at 200 E. Wells Street, Milwaukee, Wisconsin 53233.

7. Officer Kaonnice M. Whitley is an adult resident of the State of Wisconsin and employed with the Milwaukee Police Department.

8. Officer Nicholas M. Kropp is an adult resident of the State of Wisconsin and employed with the Milwaukee Police Department.

9. Chief of Police Jeffrey B. Norman is an adult resident of the State of Wisconsin and employed with the Milwaukee Police Department.

10. On June 6, 2022, Kelvyn C. Hill, Morhonda S. Hill, and Kelvin Williams were struck by a Milwaukee Police Department squad car, which was operated by Officer Kaonnice M. Whitley, as they were traveling westbound along Capitol Drive approaching the intersection at Teutonia Avenue with a green light.

11. At all times material, the police squad car was owned, operated, and maintained by the above-named parties.

12. At all relevant times hereto, Officer Kaonnice M. Whitley and Officer Nicholas M. Kropp were police officers employed by the Milwaukee Police Department and were acting within the scope of their employment at the time of the collision.

13. The above-named parties were negligent as to the speed, look-out and control of their police squad car, the training and supervision of the operators of the police squad car, and the inspection, repair, and maintenance of the police squad car.

14. At all relevant times hereto, Officers Whitley and Kropp were trained, supervised, and operating under Standard Operating Procedure 660: Vehicle Pursuits and

Emergency Vehicle Operations. That policy was promulgated, authorized, and approved by the Milwaukee Police Department, its Chief of Police, Jeffrey B. Norman, and therefore, the City of Milwaukee.

15. Kelvyon C. Hill, Morhonda S. Hill, and Kelvin Williams all suffered personal injuries as a direct and proximate result of the intentional actions and negligent actions and omissions of Officer Kaonnie M. Whitley and Officer Nicholas M. Kropp and the Milwaukee Police Department.

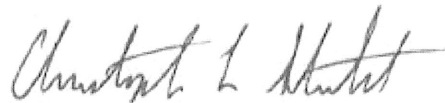
16. As a direct and proximate result of the negligence of the above-named parties, Tonja Williams suffered the loss of the aid, society, comfort and companionship of her husband, Kelvin Williams.

17. At all times material, the above-named parties had actual notice of the aforesaid incident and either thoroughly investigated it or are aware of other entities investigating same.

Dated at Milwaukee, Wisconsin this 19th day of September 2022.

GIMBEL, REILLY, GUERIN & BROWN LLP

By:



CHRISTOPHER L. STROHBEHN

State Bar No. 1041495

Email: cstrohbahn@grglaw.com

Attorneys for Claimants Kelvyon C. Hill,
Morhonda S. Hill, Kelvin Williams and
Tonja Williams

POST OFFICE ADDRESS:

330 East Kilbourn Avenue, Suite 1170
Milwaukee, Wisconsin 53202
Telephone: 414/271-1440
Facsimile: 414-271-7680